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MCI

MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20006
202 887 2380
FAX 202 887 3175
VNET 220 2380
2181493@MCIMAIL.COM
MCI Mail ID 218-1493

Karen T. Reidy
Attorney
Federal Law and Public Policy

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 11, 1999

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary - Room TWB-204
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte: CC Docket Nos. 98-121

Dear Ms. Salas:

On June 11, 1999, I faxed the attached recent filing of MCI WorldCom with the Georgia Public Service Commission to Andrea Kearney, of the Common Carrier Bureau's Policy and Program Planning Division. I also faxed the attached one page summary of the filing. The subject matter of the filing is BellSouth's proposal for third party testing in the state of Georgia. Please include this filing in the record of the above-referenced proceeding.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Karen T. Reidy

Karen T. Reidy

Attachments

cc: Carol Mattey
Andrea Kearney
Bill Agee

No. of Copies rec'd 0+1
List A B C D E

EXECUTIVE SUMMARY

Third party testing is critical to local entry, and indeed has helped make MCI WorldCom's entry into the New York local market possible. BellSouth's Test Plan includes several features from the New York third party testing process, and BellSouth made a commendable decision to choose KPMG and HP as the testers. The following modifications, however, need to be made to the proposed plan:

1. Ensure BellSouth's interfaces are fully tested.

   - CLECs should be able to submit test scenarios to be processed by the testers. Otherwise, only BellSouth's hand picked scenarios will be used. Allowing CLECs to submit testing scenarios will ensure that a broad range of scenarios encompassing a variety of products and market entry strategies is used. For example, the test should additionally include but not be limited to scenarios for retaining directory listings "as is" in conjunction with the provisioning of LNP.

   - New releases of BellSouth's interfaces should be tested. In particular, BellSouth's new ordering interfaces based on the upcoming OSS 99 release, which will have major enhancements, should be tested.

   - Testers should be required to use BellSouth's documentation to build to BellSouth's ordering interfaces. Otherwise, there is no assurance that CLECs can use BellSouth's documentation for necessary development.

   - Change management procedures should be observed and tested in action, not just based on documentation and interviews.

   - CLECs should be permitted to comment on the exception report process as well as the exception reports issued during testing

2. UNEs to be tested should be clarified and expanded.

   - The Commission should clarify that "loop/port combination" means UNE-P[1].
   - XDSL loops should be tested.
   - DS1 loop transport combinations should be tested.

3. Performance metrics and standards should be determined with CLEC participation, and BellSouth reporting should be subject to audit.

4. A reasonable testing schedule should be adopted. Once the Commission issues orders adopting a test plan, adopting an exception report process and adopting performance metrics and standards, the following schedule would be appropriate:

   - 30 days -- Test Set-up
   - 60 days -- First Interim Report OSS Plan
   - 90 days -- Second Interim Report OSS Plan
   - 120 days -- Final Report

[1] UNE-P includes all the elements required to provide local telephone service: the local loop, the network interface device, switching, interoffice transmission facilities, signaling networks and call –related databases, OSS and operator services and directory assistance.

BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

In Re: Investigation Into Development Of Electronic Interfaces for BellSouth's Operational Support Systems	)))	Docket No. 8354-U

RESPONSE OF MCI WORLDCOM TO AT&T'S MOTION FOR RECONSIDERATION OF THE COMMISSION ORDER FOR THIRD PARTY TESTING

MCI WorldCom, Inc. ("MCI WorldCom") hereby files its response to the Motion for Reconsideration of the Commission Order for Third Party Testing filed by AT&T Communications for the Southern States ("AT&T). MCI WorldCom agrees with AT&T that the Commission should reconsider its Order. Specifically, MCI WorldCom submits that the Order should be more specific. Now that BellSouth Telecommunications, Inc. ("BellSouth") has filed its proposed Georgia OSS Evaluation Master Test Plan & Flow-Through Audit Plan ("Test Plan"), it is clear that certain modifications should be made to the plan before the Commission approves it. These modifications should be required by Commission Order.

I. INTRODUCTION

Third party testing is critical to opening local markets. MCI WorldCom is providing local residential service today in New York in large measure because of third party testing that has led to substantial improvement in Bell Atlantic's Operational Support Systems ("OSS"). MCI WorldCom offers local residential service throughout New York and to date has won more than 75,000 local customers. MCI WorldCom is adding approximately 5000 residential customers per week and plans to increase that pace once development of the New York EDI pre-ordering interface is complete. This

experience demonstrates that effective third party OSS plays a crucial role in opening the doors to local competition.[1]

This Commission has again proven its leadership in opening local exchange markets by ordering third party testing of BellSouth's OSS. And BellSouth, to its credit, has proposed a test plan that incorporates a number of features from the successful New York plan. In particular, BellSouth should be commended for its choice of HP and KPMG as the third parties that will conduct and audit the test. Based on MCI WorldCom's experience in New York, it has confidence in HP's and KPMG's ability to carry out the test fairly and effectively, provided the test is structured properly. MCI WorldCom believes that if certain critical revisions are made to the proposed Test Plan, it can serve to bring BellSouth's OSS up to the standards required to support local entry in Georgia on a broad scale. Without these changes, however, testing will not give the Commission a true picture of BellSouth's OSS and will not drive the enhancements necessary to enable CLECs to compete in the local market and meet customers' needs.

To achieve the objectives of properly evaluating BellSouth's OSS and making necessary improvements to it, the Commission should (1) ensure that BellSouth's OSS interfaces are fully tested; (2) require that the UNEs to be tested be clarified and expanded; (3) adopt the performance measurements and standards to be applied with input from all parties, and require auditing of all performance measurement reporting; and (4) adopt a schedule that ensures the test can be conducted thoroughly and methodically.

[1] Other factors also must be present. The most critical of these are cost-based pricing and the availability of UNE-P, which the Commission will address in Docket No. 10692-U.

The changes proposed below will ensure that everyone's resources are used wisely and that their objectives are achieved in an efficient and productive manner. Specifically, when the third party testing process is completed, BellSouth will have its OSS validated; CLECs will have the OSS they need to compete in the local market; and the Commission will have made substantial progress in carrying out its responsibilities under Sections 251 and 271 of the Telecommunications Act of 1996. These objectives can be achieved without significantly extending the third party testing process.

II. INTERFACES MUST BE FULLY TESTED

Third party testing must ensure that BellSouth's interfaces can process the full range of OSS transactions at expected normal and peak commercial volumes. To achieve that goal, BellSouth's Test Plan must be modified in a number of ways: (A) CLECs should be able to submit test scenarios to be processed by the testers; (B) new releases of BellSouth's interfaces (especially those based on OSS 99) should be tested; (C) testers should be required to use BellSouth's documentation to build to BellSouth's ordering interfaces; (D) change management procedures should be observed and tested in action, not just based on documentation and interviews; and (E) CLECs should be permitted to comment on the exception report process as well as the exception reports issued during testing. These modifications are addressed below.

A. CLECs Should Be Able to Submit Test Scenarios to Be Processed by the Testers

BellSouth appears to have hand picked test scenarios that it believes will enable it to pass the test. BellSouth did not, for example, choose any scenarios designed to test upgrades to its systems that were to have been made by April 1, 1999. These upgrades relate to orders migrating all or part of a customer's lines to a CLEC while leaving the

customer's directory listing information as is. Obviously, the ability to migrate a customer without jeopardizing its directory listings is critical to customer satisfaction and sustainable market entry by CLECs. This functionality should be tested. More generally, CLECs should be able to submit test scenarios to the testers for processing. Such participation by CLECs will ensure that a broad range of scenarios encompassing a variety of products and market entry strategies is used. It also will provide a more realistic view into the conditions CLECs face when trying push orders through BellSouth's systems.

B. New Releases of BellSouth's OSS Interfaces Should Be Tested

BellSouth should be required to test upgrades to interfaces that are released during the test period. In particular, the testers should test OSS 99, which includes enhancements to be made to the EDI and TAG ordering interfaces.[2] The release of OSS 99 initially was scheduled for next month, but has been pushed back by BellSouth to September 1999. The business rules for OSS 99 have been under development since November 1998 and are believed to be complete so that testers could begin building to the interface now, while BellSouth is developing and testing the interface. OSS 99 would provide the best evaluation of how BellSouth documents, develops, tests and releases its systems. Ordering interfaces based on OSS 99 are expected to be the ordering interfaces of choice for CLECs and are likely to be the interfaces used by CLECs when broad-scale market entry occurs in Georgia. It only makes sense to test the OSS 99 interfaces and work out whatever flaws may exist during the third party testing process. Moreover, OSS

[2] MCI WorldCom notes that EDI preordering initially was to be included in the OSS 99 project, but eventually was excluded by BellSouth. EDI preordering will be critical to MCI WorldCom's ability to order and provision UNE-P, once it is made available in Georgia. MCI WorldCom respectfully submits that EDI preordering should be included in the third party test.

99 provides support for several new functionalities, including business UNE-P (non POTS), DS0 and DS1 four wire Digital Loops, complex directory listings, resale complex services, ISDN, hunting, and a new process for partial migrations (initial and subsequent). These important functionalities can be assessed only if the OSS 99 interfaces are tested.

C. Testers Should Be Required to Use BellSouth's Documentation to Build to BellSouth's Ordering Interfaces

Requiring testers to develop the software to build to BellSouth's ordering interfaces will ensure that a CLEC entering the market could use BellSouth's documentation to develop to such an interface without handholding by BellSouth. When MCI WorldCom and AT&T developed to BellSouth's current EDI ordering interface, they encountered poor documentation that required months of meetings and other communications with BellSouth to clarify. The testers should ensure that this problem has been rectified. The most sensible way to do that is for the testers to use BellSouth's documentation to build to the OSS 99 interfaces.[3] The testers can build to the EDI interface much more quickly and cheaply than a CLEC, because the testers' interface is not integrated into real back-end business operations and need not be as large and robust as actual commercial systems. It is estimated that this development could be done in 30-60 days, well in time for the release of the new interfaces.

[3] BellSouth apparently plans to test EDI by having orders submitted using EDI-PC, a software package based on the current, but soon to be outdated, EDI version 7.0. This approach is not satisfactory because the testers would not be building to the EDI interface and testing BellSouth's documentation. Further, because EDI-PC is based on EDI version 7.0, rather than OSS 97, using EDI-PC for the test will be of little use for purposes of local market entry.

D. Change Management Procedures Should Be Observed and Tested in Action, Not Just Based on Documentation and Interviews

Having effective change management procedures in place is important because, if they are not observed, OSS (even after it has been tested) would grind to a halt once BellSouth made changes to an interface. The "testing" BellSouth proposes for change management is based solely on documentation and interviews. Developing a theoretical understanding of how change management is supposed to work falls far short of observing change management in action. The testers should be required to observe the release and necessary changes to OSS 99, which should provide them an excellent opportunity to see how well BellSouth's change management procedures work in practice.

E. CLECs Should Be Permitted to Comment on the Exception Report Process as Well as the Exception Reports Issued During Testing

Testers identify and resolve problems with OSS through an exception reporting process. BellSouth includes defining the exception reporting process in its list of global entrance criteria. BellSouth states that "[a] defined process must be in place by which test defects are identified, assigned, resolved, and escalated. KPMG, HP and BellSouth must agree to this exception reporting process." (BellSouth Test Plan, p. III-6.) MCI WorldCom submits that the Commission should decide what the exception reporting process will be, based on input from CLECs as well as BellSouth, HP and KPMG. Further, CLECs should be permitted to comment on exception reports issued during the testing process. More specifically, KPMG should lead periodic meetings for the parties' technical personnel to discuss the progress of the test and exception reports that have

been issued. The closing of all exception reports should be one of the exit criteria of the third party test.

III. UNES TO BE TESTED SHOULD BE CLARIFIED AND EXPANDED

The UNEs that the Commission required BellSouth to test include UNE analog loops (with and without number portability), UNE switch ports and UNE business and residence loop/port combinations. MCI WorldCom respectfully submits that the term "loop/port combination" should be clarified to encompass UNE-P and that xDSL loops and DS1 loop/transport combinations should be added to the list of UNEs to be tested. All three of these products will be key to competitors' local entry plans in Georgia.

The availability of UNE-P[4] (at cost-based prices) is a gating item for widespread entry into the residential market. For example, the availability of UNE-P has enabled MCI WorldCom to launch residential service in New York. Although it is not entirely clear, it appears BellSouth has not included UNE-P in its Test Plan. BellSouth apparently has taken literally the Commission's directive to test "loop-port combinations." In its test scenarios for loop-port combinations (UNE scenarios 420-45), the only elements depicted are the loop and port. Transport, signaling call-related databases, operator services and directory assistance are not included. To make matters worse, BellSouth's diagrams indicate that CLECs must use a collocation space to avail themselves of the loop-port combination, which is discriminatory. If true UNE-P is not tested, much of the utility of third party testing will be lost -- the testing of UNE-P therefore should be required in no

[4] UNE-P includes all the elements required to provide local telephone service: the local loop, the network interface device, switching, interoffice transmission facilities, signaling networks and call-related databases, OSS and operator services and directory assistance.

uncertain terms. Such testing should include all switch features, including all custom call services listed on page A-18 of BellSouth's Test Plan, plus Memory Call Voice Mail, and all TouchStar features listed on p. A-19. Due to the rapidly developing market for broadband and data services, BellSouth's support for all types of xDSL is vital to the future of competition and should be tested as fully as possible. In particular, access to loop qualification and BellSouth bandwidth management information should be tested, along with other xDSL specific systems.

MCI WorldCom and other CLECs use DS1 loop/transport combinations to serve many of their business customers. But BellSouth states that loop/transport combinations are out of the scope of the third party test for ordering, provisioning and billing. (BellSouth Test Plan, p. A-8.) The Test Plan should be revised to require the testing of these UNE combinations.

IV. PERFORMANCE METRICS AND STANDARDS SHOULD BE DETERMINED WITH CLEC PARTICIPATION, AND REPORTING SHOULD BE SUBJECT TO AUDIT

Performance measurements and standards determine what will be graded and what is required to pass the test. Before testing, a performance measurement system must be validated and test results must be measured against pre-established performance standards. BellSouth acknowledges that these tasks remain to be performed.

BellSouth notes that the Commission already has approved a set of performance measurements, but states that before many portions of the test can begin, metrics must be agreed to and fully defined and "must be fully functional, tested, and operationally ready." (BellSouth Test Plan, p. III-6.) BellSouth states that the Commission, with assistance from the auditors, "will assess the operational readiness of all required

BellSouth measurements and verify that all requirements have been met." (*Id.*) The metrics BellSouth would like to use are listed in its Appendix D. In essence, what BellSouth is requesting the Commission to do is revise its performance measurement order and adopt BellSouth's latest SQM reporting system. Although MCI WorldCom agrees that consideration of the performance metrics to be used is appropriate at this juncture, it does not agree that BellSouth's SQM should be adopted wholesale. Once BellSouth files its detailed metrics (along with their definitions) to the Commission, CLECs should be permitted to submit comments before the Commission makes a final determination of the metrics to be used during testing.

BellSouth is vague about how the third party test will be graded. BellSouth states that "[p]erformance metrics will be developed for each test to determine whether the results deviate from expectations. In those cases where results deviate, statistical analysis will be undertaken to determine the significance of the deviation." (BellSouth Test Plan, p. III-5.) BellSouth further states that assessing test results will include "comparing expected results files with actual results." (BellSouth Test Plan, App. D, p. 2.) BellSouth does not explain what it means by "expectations" or "expected results files." This issue must be clarified. Again, once BellSouth files its proposed performance standards, CLECs should be permitted to comment before the Commission makes a decision.

The Commission's Order on Petition for Third Party Testing required BellSouth to have its flow-through service report audited by the testers. BellSouth proposes to do this by having the testers compare the flow-through results they gather to the results generated by BellSouth's reporting system. As part of this process, BellSouth should specify all orders that fall out for manual processing. More generally, MCI WorldCom

respectfully submits that all of BellSouth's OSS reporting should be audited in the same manner as the flow-through reports so the Commission can be assured that these reports are accurate.

V. A REASONABLE TESTING SCHEDULE SHOULD BE ADOPTED

BellSouth proposes a test schedule that is overly ambitious. For example, BellSouth proposes that a First Interim Report OSS Plan be submitted on June 15, 1999, the date the Commission is likely to vote on BellSouth's Test Plan. Such a schedule evidences a desire to "get this over with," rather than to engage in a serious and thorough test. The schedule also is inconsistent with the global entrance criteria set out in BellSouth's Test Plan at p. III-6. For example, before testing can begin, it will be necessary to define an exception reporting process as well as applicable performance metrics and standards. MCI WorldCom proposes that once the Commission issues orders adopting a test plan, adopting an exception report process and adopting performance metrics and standards, the following schedule would be appropriate:

30 days -- Test Set-up
60 days -- First Interim Report OSS Plan
90 days -- Second Interim Report OSS Plan
120 days -- Final Report

Of course, such a schedule would be subject to change depending on test results.

VI. CONCLUSION

The Commission's Order should be modified to be more specific. BellSouth's proposed Test Plan is a good initial step toward the implementation of third party testing. The modifications proposed by MCI WorldCom provide for necessary CLEC participation and critical enhancements to the plan that will ensure that it provides a true

evaluation of BellSouth's OSS. These modifications will not add significantly to the length of the testing process. MCI WorldCom respectfully requests that they be adopted.

Respectfully submitted,

Dulaney L. O'Roark III
Martha P. McMillin
MCI Telecommunications Corporation
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342
(404) 267-6391

David I. Adelman, Esq.
Sutherland, Asbill & Brennan, LLP
999 Peachtree Street, N.E.
Atlanta, Georgia 30309
(404) 853-8206

Attorneys for MCI WorldCom, Inc.